

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

COMMON CARRIER BUREAU

LOCAL COMPETITION
SURVEY

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CC Docket No. 91-141
CCB-IAD File No. 98-102

**REPLY COMMENTS OF
SBC COMMUNICATIONS INC.**

SBC Communications Inc. ("SBC") respectfully files these reply comments on the Common Carrier Bureau's Public Notice seeking comments on the method of collecting information on local exchange and exchange access competition, released on May 8, 1998. These reply comments are submitted on behalf of SBC and its subsidiaries Nevada Bell, Pacific Bell, and Southwestern Bell Telephone Company.

The comments of some respondents indicate that they are more interested in dumping burdensome obligations on ILECs than in helping the Commission get an accurate picture of competition. Some respondents went so far as to suggest:

- that the reporting burden be greater on ILECs than CLECs;¹
- that ILECs report monthly, while CLECs report quarterly;²
- that ILECs report on service to large retail customers;³

¹ Comments of Allegiance Telecom, Inc., p. 2; Comments of KMC Telecom, Inc., p. 3.

² Comments of Alligiance, p. 2.

³ *Id.*, at p. 3.

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FEDERAL COMMUNICATIONS COMMISSION
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OFFICE OF THE SECRETARY

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- that CLECs not be obligated to report information on resale, collocation, or unbundled network elements.⁴

The rationale for these positions includes the argument that CLEC reporting only "corroborate[s]" ILEC reporting. This is untrue. While having both ILECs and CLECs reporting helps reassure the Commission that it is obtaining as complete a picture of local competition as possible through the survey mechanism, the rationale for requiring CLEC participation is not based on some preconceived belief that ILECs won't be reporting accurately. CLECs must participate fully because there is critical information on local competition to which only the CLECs will be privy. For example, CLECs can provide local service by using another carrier's network, bypassing the ILEC entirely. Under these circumstances, the ILEC would not be able to supply critical information about local competition. In short, ILECs won't have access to all data necessary to make the survey a valuable tool to the Commission.

SBC endorses participation by all local exchange carriers — ILECs and CLECs, urban carriers and rural carriers. Moreover, SBC recommends that the reporting burden be the same for all — same level of detail and the same frequency. If the goal of the survey is to pinpoint the status of local competition, there is no reason to have certain participants reporting monthly and others reporting quarterly. Each participant must report as frequently as the other.

SBC also believes that the Commission should not presume *a priori* how the various participants will conduct competition in the market. Some respondents would have the Commission believe that CLECs need not report resale, collocation, network unbundling and the like. This position is based on the argument that ILECs have the obligation of providing these

⁴ Comments of KMC, p. 3.

kinds of services. Yet, there is nothing stopping CLECs from providing these services or from obtaining these services from other carriers. Any picture of competition would be incomplete without CLECs reporting on these services, too.

In its original comments, SBC urged the Commission to accept reporting on the statewide level. While SBC was aware that this level of reporting was not optimum, SBC was also aware that the statewide level is the only level at which the participants can compare "apples to apples." ILECs generally must report based on wire centers. ILEC wire center boundaries do not conform to geographical boundaries. SBC believes there are no Metropolitan Statistical Areas ("MSA") that conform to a distinct set of wire centers. What's more, wire center designations are probably meaningless to CLECs. The only level at which all participants can meet is the statewide level.

SBC believes that some respondents have a personal agenda in requesting the MSA level of reporting and requesting that ILECs report on their service to large retail customers. In addition to adding needless burdens to their competitors — the ILECs — and seeking to breach ILEC-customer confidentiality, these CLEC respondents may be hoping to use the Commission's tool for gauging local competition as a marketing tool of their own. While SBC actively supports opening its local markets to fair competition, it opposes the potential use of this survey in a predatory manner. To the degree reasonably possible, the Commission ought to resist suggestions for the survey that have as their aim the personal agenda of the respondents. If the survey is meant to assist the Commission in capturing the state of local competition, then it should not be designed to assist competitors in their marketing efforts.

In its original comments, SBC agreed that it could accept reporting on a quarterly basis but opposed reporting on a more frequent basis. SBC has not deviated from this position. Nevertheless, SBC notes that many respondents requested that the survey be complied on a semi-annual basis. SBC can support this level of frequency, as well. SBC only requests that the frequency of reporting be the same for all participants.

SBC notes that it is not necessary to require reporting of performance criteria or denial of physical and virtual collocation requests. This information will be available to the Commission through other and more appropriate means. Just as important, however, SBC recognizes that, while these matters will arguably contribute to CLECs' ability to participate fully in the market, these matters do little or nothing to contribute to the Commission's view of the level of actual competition in the local market place. If the Commission is interested in the state of local competition and in not unduly burdening the participants, then these matters need not be included in the scope of the survey.

SBC takes exception to the recommendation that "CLECs should be [allowed] to provide estimated information in response to the survey questions rather than . . . exact counts."⁵ Responding to surveys is burdensome on every carrier. While SBC urges the Commission to take steps to reduce unnecessary burdens on all the carriers, it notes that the survey would be rendered useless and meaningless if some participants were allowed to provide "estimated information" — a term fraught with ambiguity and given to much mischief. Accuracy — if not fairness — requires all participants to play by the same rules and to provide the same level of exactitude.

⁵ Comments of AT&T Corp., pp. 12-13.

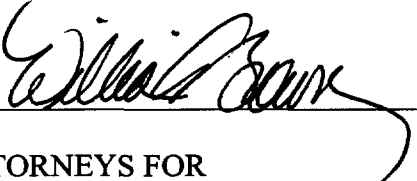
CONCLUSION

SBC requests that these reply comments be given due consideration.

Respectfully submitted,

SBC COMMUNICATIONS INC.

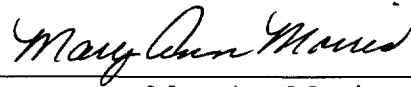
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Certificate of Service

I, Mary Ann Morris, hereby certify that the foregoing, "Reply Comments of SBC Communications Inc." in CC Docket No. 91-141/CCB-IAD File No. 98-102 has been served on June 22, 1998, to the Parties of Record.

A handwritten signature in cursive script, reading "Mary Ann Morris", is positioned above a horizontal line.

Mary Ann Morris

June 22, 1998

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